

RM 10868 Comments ---- Radio Amateur Foundation (RAF) Proposal

FCC Chairman Powell, Commissioners, and Wireless Telecommunications Bureau:

The RAF proposal appears to be the most appropriate proposal. However, it proposes the same inappropriate (between the lines) double grandfathering from general class to advanced class and then grandfathering again from advanced class to extra class, without examination at either license class as detailed in my ARRL proposal comments. The same caveats and duties apply as well for this proposal.

Scrapping the existing question pool is of merit and is credible, logical, reasonable, and practical. New question pools must not be published. Study guides presenting the test subject material in an understandable format are appropriate as long as the examination questions (stems and distracters) are not available in the study guides or in other publications/formats/modes. The purpose is to ensure that the examinee understands and retains the material being tested. Academicians will inform you that memorizing questions for an examination results in a very rapid 95-98% loss of the memorized information in a very short time. In the end very little or nothing has been accomplished.

Would one go to a physician or attorney that had been given all the answers to the examinations? Because of a lack of understanding of the material they would have no inductive or deductive reasoning, or professional application skills.

A 5 wpm Morse code requirement for the general class license rather than the extra class is appropriate.

Likewise, significant diversion of existing CW/data band plan elements to voice/phone modes etc., will openly discourage amateur radio operators from developing CW skills and use of CW in amateur radio.

Thoughts Relating to an Appropriate Ruling --- 3 classes of Amateur Radio License

The appropriate ruling for the Amateur Radio Service would be to grandfather those Advanced class licensees that have previously passed the Advanced class examination to Extra class; justified by the previous similarity of the examination content.

Permit those current Advanced class radio amateur licensees that were previously grandfathered from General class to Advanced class to remain at Advanced class until they upgrade to Extra by examination.

This will reduce the Advanced licensee census, thus reducing the administrative load.

Likewise, grandfather all Technician plus/Technician HF class licensees to General. Require 5 wpm Morse code to General (if Element 1 was not previously passed) and 10 wpm to Extra class. Morse code requirement(s) are justified to ensure appropriate motivation, skill, intent, and practices of each operator in the Amateur Radio Service.

Grandfathering Technician to General would depend upon where the requirement for the Morse code examination is placed. If nothing else, at least 5 wpm Morse code at some point in the licensing process.

Present Novices are grandfathered to the new Novice or Communicator license, or however designated license.

This is the fairest and most appropriate plan for the future of the Amateur Radio Service. It provides the most incentive for upgrading. This will reduce the number of license classes to three, ultimately the reducing the administrative load.

Eliminate the present question pools and the NCVEC write new questions. Then ARRL, W5YI, Gordon West Radio School, and the likes can prepare legitimate study guide texts. The study guide texts will contain NO test questions. The study guide text authors must not write the study guides from the actual questions.

Band, spectrum, mode, and power output privileges must be proportional to the class of license. Incentive is generated with significant increases in band, mode, and power output privileges for each license class. Minor differences between the band, spectrum, mode, and power output privileges for each license class will not result in sufficient incentive/motivation to upgrade.

It is imperative that the Amateur Radio Service require challenging standards in the licensing and upgrade process to ensure the quality of the Amateur Radio Service in the United States. Another Citizens Band Radio-type fiasco is unacceptable.

Thank you.

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